

MIRANDA KANE (SBN 150630)
LIZ KIM (CA Bar No. 295277)
CONRAD | METLITZKY | KANE LLP
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: (415) 343-7100
Facsimile: (415) 343-7101
Email: mkane@conmetkane.com
lkim@conmetkane.com

Attorneys for Defendant Roskin-Frazee

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NOAH ROSKIN-FRAZEE,

Defendant.

CASE NO. 25-CR- 0053-WHO (PK)

**STIPULATION AND ~~PROPOSED~~ ORDER TO
MODIFY CONDITIONS OF PRE-TRIAL
RELEASE**

On December 11, 2024, Defendant Noah Roskin-Frazee was arrested and placed on pre-trial release in 23-CR-0471-WHO with a number of conditions, including that he surrender his passport and that his travel be restricted to the Northern District of California, where his permanent residence with his mother is located, and the Central District of California, where he was then attending college. (Dkt. 8).

There have been several travel modifications since:

- On January 31, 2024, the Court modified his release conditions to allow travel to Las Vegas, Nevada, where his father resides. (Dkt. 18).

- 1 • On February 13, 2024, the Court further modified Mr. Roskin-Frazee's travel conditions to
2 include the Eastern District of California as the most direct routes between his home and school,
3 either by car and air, required that he travel through or over that district. (Dkt. 24).
- 4 • On June 28, 2024, the Court modified his release conditions to allow international travel to
5 London, Scotland, and Barcelona between July 19 to July 29, 2024 and Canada between August
6 5 to August 14, 2024. (Dkt. 46).
- 7 • On December 3, 2024, the Court modified his release conditions to allow travel to Hawaii with
8 his family from January 3, 2025 to January 10, 2025. (Dkt. 71).
- 9 • On March 3, 2025, the Court modified his release conditions to allow unrestricted domestic
10 travel with advance permission and approval from Pre-trial Services. (25-CR-00053-WHO(LC),
11 Dkt. 10.)

12 To date, Pretrial Services has not alleged that Mr. Roskin-Frazee has violated any of the terms or
13 conditions of pre-trial release.

14 On February 27, 2025, Defendant Roskin-Frazee was arraigned on the above referenced
15 misdemeanor Information (25-CR-0053-MAG) and released on the same terms and conditions as in 23-
16 CR-0471-WHO. Mr. Roskin-Frazee now requests that the Court modify his release conditions in both
17 cases to allow for Mr. Roskin-Frazee to travel to Singapore to visit former co-workers from August 17,
18 2025 to August 29, 2025. Mr. Roskin-Frazee will provide his complete air travel and trip itinerary to the
19 government and Pre-trial Services in advance. Neither Mr. Roskin-Frazee's pre-trial services officer nor
20 United States Attorney Nikhil Bhagat object to Mr. Roskin-Frazee's travel request.

21 //
22
23
24
25
26
27
28

1 AUSA Bhagat has reviewed this Stipulation and [Proposed] Order and authorizes undersigned
2 counsel to file it on the parties' behalf.

3
4 **IT IS SO STIPULATED.**

5
6 DATED: August 7, 2025

Respectfully submitted,

7 **CONRAD | METLITZKY | KANE LLP**

8 /s/ Miranda Kane

9 MIRANDA KANE

10 Attorney for Noah Roskin-Frazee

11
12 DATED: August 7, 2025

CRAIG H. MISSAKIAN

13 Attorney for the United States

14 /s/ Nikhil Bhagat

15 NIKHIL BHAGAT

16 Assistant United States Attorney
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

GOOD CAUSE BEING SHOWN and pursuant to the parties' stipulation, Noah Roskin-Frazee's condition of pre-trial release in 25-CR-0053-WHO shall be modified to allow travel to Singapore from August 17, 2025 to August 29, 2025, with advance permission and approval from Pre-Trial Services. Pretrial Services is ordered to release Mr. Roskin-Frazee's passport to him, or counsel, no later than August 15, 2025. Mr. Roskin-Frazee must return his passport to Pretrial Services no later than September 2, 2025. All other conditions of release shall remain in effect.

IT IS SO ORDERED.

Dated: August 7, 2025


THE HONORABLE PETER KANG
United States Magistrate Judge